# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

DATAQUILL LIMITED,

Plaintiff,

V.

\$ 2:13-cv-634-JRG

ZTE (USA) INC., § JURY TRIAL REQUESTED

Defendant.

## JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff DataQuill Ltd. ("DataQuill") and Defendant ZTE (USA), Inc. ("ZTE") jointly come before the Court and request that all deadlines in the case be stayed by thirty (30) days. All matters in controversy between the parties have been settled in principle, and the parties request a 30 day stay to prepare and finalize the appropriate dismissal papers. A proposed order is attached.

Dated: December 2, 2015 Respectfully submitted,

#### /s/ Blaine Larson

Parker C. Folse, III (LEAD COUNSEL) Washington State Bar No. 24895 pfolse@susmangodfrey.com SUSMAN GODFREY LLP 1201 Third Avenue, Suite 3800

Seattle, Washington 98101 (206) 516-3880 Telephone: Facsimile: (206) 516-3883

Joseph S. Grinstein Texas Bar No. 24002188 jgrinstein@susmangodfrey.com Brian R. Hogue (Pro Hac Vice) Texas Bar. No 24094725 bhogue@susmangodfrey.com

SUSMAN GODFREY LLP

1000 Louisiana Street, Suite 5100 Houston, Texas 77002-5096 Telephone: (713) 651-9366

Facsimile: (713) 654-6666

Leslie V. Payne Texas Bar No. 00784736 lpayne@hpcllp.com Blaine A. Larson Texas Bar No. 24083360 blarson@hpcllp.com

HEIM, PAYNE & CHORUSH, LLP 600 Travis Street, Suite 6710 Houston, Texas 77002-2912 Telephone: (713) 221-2000 Facsimile: (713) 221-2021

S. Calvin Capshaw, III Texas Bar No. 03783900 ccapshaw@capshawlaw.com Elizabeth L. DeRieux Texas Bar No. 05770585 ederieux@capshawlaw.com CAPSHAW DERIEUX, LLP 114 E. Commerce Ave. Gladewater, TX 75647

Telephone: (903) 236-9800 Facsimile: (903) 236-8787

T. John Ward, Jr. State Bar No. 00794818 jw@wsfirm.com

#### WARD & SMITH LAW FIRM

P.O. Box 1231

Longview, Texas 75606-1231 Telephone: (903) 757-6400 Facsimile: (903) 757-2323

### ATTORNEYS FOR DATAQUILL LIMITED

/s/ Alexas D. Skucas

Michael P. Sandonato
New York Bar No. MP-4278
FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, NY 10104

Telephone: (212) 218-2100 Facsimile: (212) 218-2200

Brian L. Klock
Virginia Bar No. 37808
bklock@fchs.com
Edmund J. Haughey
Virginia Bar No. 42845
ehaughey@fchs.com
Chitra M. Kalyanaraman
New Jersey Bar No. 031302010
ckalyanaraman@fchs.com
Stephen K. Yam
Virginia Bar No. 81104

syam@fchs.com
FITZPATRICK, CELLA, HARPER & SCINTO
975 F Street, NW

Washington, DC 20004 Telephone: (202) 530-1010 Facsimile: (202) 530-1055

Eric H. Findlay TX Bar No. 00789886 efindlay@findlaycraft.com Brian Craft TX Bar No. 04972020 bcraft@findlaycraft.com FINDLAY CRAFT, P.C. 102 N. College Avenue, Suite 900 Tyler, TX 75702

Telephone: (903)534-1100 Facsimile: (903) 534-1137

Robert F. Perry
rperry@kslaw.com
Alexas D. Skucas
askucas@kslaw.com
Christopher C. Carnaval
ccarnaval@kslaw.com
KING & SPALDING LLP
1185 Avenue of the Americas
New York, NY 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Adam M. Conrad aconrad@kslaw.com KING & SPALDING LLP 100 N. Tryon Street, Suite 3900 Charlotte, NC 28202 Telephone: (704) 503-2600

Telephone: (704) 503-2600 Facsimile: (704) 503-2622

COUNSEL FOR DEFENDANT ZTE (USA) INC.

### **CERTIFICATE OF SERVICE**

I hereby certify that the above document was served to all counsel of record via email on December 2, 2015.

/s/ Blaine Larson Blaine Larson